June 18, 2007

MLPA Blue Ribbon Task Force
Marine Life Protection Act Initiative
c/o California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Re: Comments on "California Marine Life Protection Act Initiative Strategy for Stakeholder and Interested Public Participation" as revised on March 30, 2007

Dear Task Force Members:

Thank you for the opportunity to comment on the "Strategy for Stakeholder and Interested Public Participation." The American Sportfishing Association (ASA) is the sportfishing industry's trade association. We are committed to looking out for the interests of the entire sportfishing community, including California's nearly one million saltwater anglers, who contribute about $838 million annually in retail sales towards the sportfishing industry's $1.7 billion economic output in the State of California. Our goal is to ensure that the California Marine Life Protection Act (CA MLPA) is implemented in a cooperative fashion that not only sustains, but improves, the economic and social benefits of sportfishing in California while maximizing fisheries conservation in the state.

ASA commends the MLPA Blue Ribbon Task Force for recognizing the importance of meaningful public and stakeholder participation. In general, we support the spirit of the document, which aims to build a network of positive and constructive stakeholder relationships. In order for the MLPA Initiative to be successful, all the various interests and stakeholders mentioned in the strategy – and perhaps some that are no specifically mentioned – must be active participants in its implementation. However, it is equally, if not more, important that the input provided by the stakeholders is valued by all those involved, especially the decision-makers. Stakeholders and members of the general public can and should comment on a consistent and constructive basis; but if those comments are not thoughtfully considered and, if appropriate, incorporated, then the robust network mentioned in the strategy is not as effective as it could be.

In regards to specific portions of the strategy, ASA has the following comments:

- In the "Stakeholders Defined" section, a sentence has been added regarding the possibility of policy guidance and direction being provided by the Blue Ribbon Task Force to the regional stakeholder group. The sentence is unclear as to the purpose and goal of this guidance; therefore, the intent of this guidance should be clarified within the

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strategy. Also, any guidance issued by the Blue Ribbon Task Force should be available for public comment prior to becoming final. This should be specified in the strategy, as well.

- In the "Responsive Decision Making" section, the language regarding an explanation as to why comments are not included in documents should be stronger. As stated earlier, the key to successful implementation of this initiative is ensuring that the comments of all stakeholders are valued. Whether or not stakeholder comments are included in a document, a clear and thoughtful rationale must be provided to ensure a fair process. The phrase current use, "make every effort" should be more definitive.

  Also, the regional stakeholder group is not included in this section. Given that another section of this strategy now states that the regional stakeholder group will be developing recommendations for the MLPA North Central Coast Project, it is imperative that stakeholders and the interested public have an opportunity to comment on any proposal and that the regional stakeholder group respond to those comments not incorporated. The recommendations developed are the foundation of this initiative and comments on these recommendations require perhaps the most consideration and response from the regional stakeholder group, Blue Ribbon Task Force, and Science Advisory Team.

Thank you again for the opportunity to comment on the strategy for stakeholder participation. ASA shares with you the desire to have robust stakeholder participation during the implementation of the CA MLPA, and we look forward to working with the Blue Ribbon Task Force on all aspects of implementation.

Sincerely,

Gordon C. Robertson

Gordon C. Robertson
Vice President